REMARKS

This is a full and timely response to the outstanding non-final Office Action mailed

July 6, 2005. Upon entry of the amendments in this response, claims 1 - 26 remain pending.

Reconsideration and allowance of the application and presently pending claims are

respectfully requested.

Rejections under 35 U.S.C. §103

The Office Action indicates that claims 1 – 5, 8 – 19 and 21 - 23 stand rejected under

35 U.S.C. 103(a) as being unpatentable over *Koss* in view of *Snapp*. Additionally, the Office

Action indicates that claims 6 – 7 and 20 stand rejected under 35 U.S.C. 103(a) as being

unpatentable over *Koss* in view of *Snapp* and further in view of *Arner*. Further, the Office

Action indicates that claims 24 - 26 stand rejected under 35 U.S.C. 103(a) as being

unpatentable over *Koss* in view of *Snapp* and further in view of *Hoisko*. Applicants

respectfully traverse the rejections.

With respect to the pending Office Action, Applicants respectfully agree with the

contention that *Koss* does not explicitly teach that the client device provides information

corresponding to at least one location in a format that lacks GPS coordinates for describing

the at least one location, as this contention appears to be clear from *Koss*' disclosure.

Specifically, *Koss* discloses:

> ***Mobile computer 20 includes a positioning receiver 49 that generates
> varying geographical coordinates indicating the varying current location of
> computer 20 and its user.*** The receiver is preferably a GPS receiver and
> communicates with processor 21 through the brush structure already described
> or by some other conventional means such as a serial communications port
> (*Koss* at paragraph 19). (Emphasis Added).

Additionally, *Koss* discloses:

> At step 300 performed by the client, comprises rendering hyperlinked
> web content containing one or more hyperlinks. Step 302 comprises allowing

a user to select a hyperlink from the rendered hyperlink content. ***Step 304 comprises obtaining current geographical coordinates of the mobile computer from a computer's GPS receiver.*** Step 306 comprises sending in an HTTP request to a hyperlink content network and eventually to a server, wherein the HTTP request includes the embedded GPS location parameter specified above.

Step 310, performed by a server, comprises receiving the HTTP request. Step 312 comprises querying a database or performing some other procedure to obtain or create content that is appropriate for the location indicated in the HTTP request. Step 314 comprises returning the content to the mobile computer.

Step 320, performed by the mobile client, comprises receiving the content. Step 322 comprises rendering the return content.

The servers can utilize the geographic information in various ways depending on the nature of the resource being requested. In many cases, the geographic coordinates will be ***utilized to provide data about the area surrounding the location of the mobile client: nearby restaurants, merchants, points of interest, maps of the area, etc***.

(*Koss*, paragraphs 0039 – 0042). (Emphasis added).

As set forth above, *Koss* involves a client that provides GPS coordinate information to a server. That is, *Koss* uses GPS coordinates as an input. However, *Koss* does not teach providing GPS coordinates as an output. Specifically, *Koss* uses the input GPS coordinates to provide data corresponding to the area associated with the input GPS coordinates. Thus, *Koss* does not teach or reasonably suggest obtaining GPS coordinates from a database as generally recited in the pending claims.

With respect to *Snapp*, *Snapp* does not teach providing GPS coordinates as an output either. Thus, *Snapp* does not teach or reasonably suggest obtaining GPS coordinates from a database as generally recited in the pending claims. This is in direct contrast to the limitations recited in Applicants' claims.

With respect to claim 1, that claim recites:

> 1.   A method for facilitating use of the global positioning system (GPS), the method comprising:
>
> coupling a client device to a network and to a GPS device;
>
> using the client device to access a database through the network, ***wherein the client device provides information corresponding to <u>at least one location</u>, other than a current location, in a format that lacks GPS coordinates for describing the at least one location***, the database containing the GPS coordinates that correspond to a plurality of locations;
>
> ***obtaining from the database <u>the GPS coordinates corresponding to the at least one location</u>***; and
>
> ***providing <u>the GPS coordinates corresponding to the at least one location</u> to the GPS device*** such that information regarding at least one of direction and distance between the current location and the at least one location is obtained.

(Emphasis added).

Applicants respectfully assert that claim 1 is in condition for allowance. In particular, Applicants respectfully assert that the cited references, either individually or in combination, do not teach or reasonably suggest at least the features/limitations emphasized above in claim 1. In this regard, Applicants respectfully assert that it appears that claim 1 has been examined without due regard to the use of antecedent basis. Specifically, claim 1 recites a relationship between "at least one location" and "GPS coordinates corresponding to the at least one location." Bearing this relationship in mind, it is clear that the cited art is not involved with "obtaining from the database the GPS coordinates corresponding to the at least one location," "the a least one location" having been previously recited in the claim as being "other than a current location" and described "in a format that lacks GPS coordinates for describing the at least one location." Therefore, Applicants respectfully request that the rejection of claim 1 be removed.

Since claims 2 – 7, 21 and 24 incorporate all the features/limitations of claim 1, Applicants respectfully assert that these claims also are in condition for allowance. Additionally, these claims recite other features that can serve as an independent basis for patentability.

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With respect to claim 8, that claim recites:

> 8.   A system for facilitating use of the global positioning system (GPS), comprising:
>
>   a client device coupled to a network and to a GPS device;
>
>   a database coupled to the network through a server device, the database containing the GPS coordinates that correspond to a plurality of locations; and
>
>   *wherein the client device obtains from the database the GPS coordinates that correspond to a location in response to the client device requesting the GPS coordinates associated with the location, the location corresponding to a location other than a current location and being identified by other than GPS coordinates*; and
>
>   *wherein the client device provides the GPS coordinates to the GPS device* such that information regarding travel between the current location and the location is obtained.

(Emphasis added).

Applicants respectfully assert that claim 8 is in condition for allowance. In particular, Applicants respectfully assert that the cited references, either individually or in combination, do not teach or reasonably suggest at least the features/limitations emphasized above in claim 8. In this regard, Applicants respectfully assert that it appears that claim 8 has been examined without due regard to the use of antecedent basis. Specifically, claim 8 recites a relationship between "the GPS coordinates that correspond to a location" and "the location corresponding to a location other than a current location and being identified by other than GPS coordinates." Bearing this relationship in mind, it is clear that the cited art is not involved with a system in which "the client device obtains from the database the GPS coordinates that correspond to" the location. Therefore, Applicants respectfully request that the rejection of claim 8 be removed.

Since claims 9 – 14, 22 and 25 incorporate all the features/limitations of claim 8, Applicants respectfully assert that these claims also are in condition for allowance. Additionally, these claims recite other features that can serve as an independent basis for patentability.

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With respect to claim 15, that claim recites:

> 15.   (Previously Presented) A computer readable medium for facilitating use of the global positioning system (GPS), comprising:
> logic configured to couple a client device to a network and to a GPS device, to use the client device to access a database through the network, ***wherein the client device provides information corresponding to at least one location, other than a current location, in a format that lacks GPS coordinates for describing the at least one location***, the database containing the GPS coordinates that correspond to a plurality of locations, ***to obtain from the database the GPS coordinates corresponding to the at least one location***, and to provide the GPS coordinates corresponding to at least one location to the GPS device such that information regarding travel between the current location and the at least one location is obtained therefrom.

(Emphasis added).

Applicants respectfully assert that claim 15 is in condition for allowance. In particular, Applicants respectfully assert that the cited references, either individually or in combination, do not teach or reasonably suggest at least the features/limitations emphasized above in claim 15. In this regard, Applicants respectfully assert that it appears that claim 15 has been examined without due regard to the use of antecedent basis. Specifically, claim 15 recites a relationship between "at least one location" and "the GPS coordinates corresponding to the at least one location." Bearing this relationship in mind, it is clear that the cited art is not involved with a system "to obtain from the database the GPS coordinates corresponding to the at least one location." Therefore, Applicants respectfully request that the rejection of claim 15 be removed.

Since claims 16 – 20, 23 and 26 incorporate all the features/limitations of claim 15, Applicants respectfully assert that these claims also are in condition for allowance. Additionally, these claims recite other features that can serve as an independent basis for patentability.

With respect to the rejection of claims 6, 7 and 20, Applicants respectfully assert that *Arner* does not teach or reasonably suggest at least the features/limitations that have been

identified as lacking in the combination of *Koss* and *Snapp*. Therefore, Applicants respectfully assert that the combination is legally deficient for the purpose of rendering obvious claims 6, 7 and 20, and respectfully request that the rejections be removed and that these claims be placed in condition for allowance.

With respect to the rejection of claims 24 - 26, Applicants respectfully assert that *Hoiske* does not teach or reasonably suggest at least the features/limitations that have been identified as lacking in the combination of *Koss* and *Snapp*. Therefore, Applicants respectfully assert that the combination is legally deficient for the purpose of rendering obvious claims 24 - 26, and respectfully request that the rejections be removed and that these claims be placed in condition for allowance.
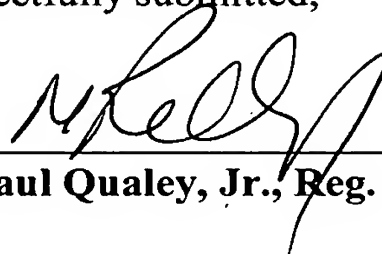
Cited Art Made of Record

The cited art made of record has been considered, but is not believed to affect the patentability of the presently pending claims.

CONCLUSION

In light of the foregoing amendments and for at least the reasons set forth above, Applicants respectfully submit that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the now pending claims 1 - 26 are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.
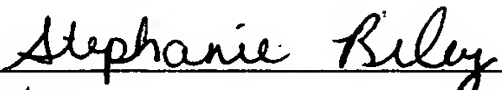
Respectfully submitted,

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I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail, postage prepaid, in an envelope addressed to: Assistant Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on _____ 8/4/05 .

Stephanie Riley
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